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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,

Plaintiff,

v.

BRUCE DENNIS LOVE (001)  
(Counts 1-80),

(Counts 1-5), and

(Counts 1-5),

Defendants.

Case No:

62 SGJ 008

**INDICTMENT  
CHARGING VIOLATIONS OF:**

COUNTS 1 and 6: CONSPIRACY,  
Class 2 Felonies, A.R.S. § 13-1003.

COUNTS 2 and 7: PARTICIPATING  
IN A CRIMINAL SYNDICATE,  
Class 2 Felonies, A.R.S. § 13-2308.

COUNTS 3 and 8: FRAUDULENT  
SCHEME AND ARTIFICE,  
Class 2 Felonies, A.R.S. § 13-2310.

COUNTS 4 and 9:  
MONEY LAUNDERING,  
Class 2 Felonies, A.R.S. § 13-2317(B)(1).

COUNTS 5 and 10: ILLEGALLY  
CONDUCTING AN ENTERPRISE,  
Class 3 Felonies, A.R.S. § 13-2312.

COUNTS 11-80: MONEY LAUNDERING  
Class 3 Felonies, A.R.S. § 13-2317(B).





### **COUNT 1 (CONSPIRACY)**

Between about September 2002 and March 2004, DEFENDANTS BRUCE DENNIS LOVE, , and

, with the intent to promote or aid the commission of an offense, did knowingly agree with one or more persons that at least one of them or another person would engage in conduct constituting a criminal offense and one or more of those persons committed one or more overt acts in furtherance of that offense, in violation of A.R.S. §§ 13-1003, 13-301 through 13-306, 13-701, 13-702, 13-702.01, and 13-801.

This conduct occurred during Defendants' ownership and operation of BMR Business Association, Inc. ("BMR"), which was an authorized delegate of Western Union at two locations, 3205 W. McDowell Rd. in Phoenix and 635 N. Country Club Rd. in Mesa. In the operation of this enterprise, Defendants agreed with employees and others that they would commit criminal offenses as necessary to serve the interests of, and to obtain business from, persons whom Defendants and their co-conspirators knew, had reason to know, suspected, or had reason to suspect, were engaged in criminal activity.

In furtherance of this conspiracy, Defendants and others knowingly committed overt acts that were designed to and did violate the SAR requirements of A.R.S. §§ 6-1241 and 6-133 and the anti-money laundering provisions of A.R.S. § 13-2317, and they engaged in this activity on a regular basis and in connection with a high percentage of the Western Union transactions at the BMR locations.

### **COUNT 2 (PARTICIPATING IN A CRIMINAL SYNDICATE)**

Between about September 2002 and March 2004, DEFENDANTS BRUCE DENNIS LOVE, , and

, intentionally organized, managed, directed, supervised or financed a criminal syndicate with the intent to promote or further the criminal objectives of the syndicate, in violation of A.R.S. §§ 13-2308, 13-2301, 13-301 through 13-306, 13-701, 13-702, 13-702.01, and 13-801.

This conduct occurred regarding Defendants' operation of BMR as an authorized delegate of Western Union at two locations. In operating this enterprise, Defendants engaged on a continuous basis in conduct that violated one or more provisions of any felony statute of Arizona, including the SAR requirements of A.R.S. §§ 6-1241 and 6-133 and the anti-money laundering provisions of A.R.S. § 13-2317.

### **COUNT 3 (FRAUDULENT SCHEME AND ARTIFICE)**

Between about September 2002 and March 2004, DEFENDANTS BRUCE DENNIS LOVE, , and

, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses, representations, promises or material omissions, and the benefit so obtained involved property with a value of \$100,000 or more, in violation of A.R.S. §§ 13-2310, 13-301 through 13-306, 13-701, 13-702, 13-702.01, and 13-801.

This conduct occurred when Defendants, by various knowing deceptions and omissions that included failing to file required SARs and filing false or misleading SARs, hid the extent of the money laundering at the BMR locations, facilitated that illegal activity, and received over \$100,000 in Western Union commissions on that activity.

### **COUNT 4 (MONEY LAUNDERING)**

Between about September 2002 and March 2004, DEFENDANTS BRUCE DENNIS LOVE, , and

knowingly initiated, organized, planned, financed, directed, managed, supervised or were in the business of money laundering, and they did so as part of a pattern of violations that involved a total of \$100,000 or more in any twelve month period, in violation of A.R.S. §§ 13-2317(A)(1) and (D), 13-2301, 13-301 through 13-306, 13-701, 13-702, 13-702.01, and 13-801.

This conduct occurred during Defendants' operation of the BMR enterprise, which they did with an established pattern of violating Arizona's anti-money laundering laws,



including the provisions of A.R.S. § 13-2317(B), which provides, in part, that a person is guilty of money laundering who does any of the following acts:

1. Acquires or maintains an interest in, transacts, transfers, transports, receives or conceals the existence or nature of racketeering proceeds knowing or having reason to know that they are the proceeds of an offense.  
...
3. Conducts a transaction knowing or having reason to know that the property involved is the proceeds of an offense and with the intent to conceal or disguise the nature, location, source, ownership or control of the property or the intent to facilitate racketeering.
4. Intentionally or knowingly makes a false statement, misrepresentation or false certification or makes a false entry or omits a material entry in any application, financial statement, account record, customer receipt, report or other document that is filed or required to be maintained or filed under title 6, chapter 12.
5. Intentionally or knowingly evades or attempts to evade any reporting requirement under section 6-1241, whether by ... failing to file a required report or record or by any other means.  
...
9. If the person is ... engaged in a trade or business, intentionally or knowingly accepts false personal identifying information from any person or otherwise knowingly incorporates false personal identifying information into any report or record that is required by section 6-1241.

#### **COUNT 5 (ILLEGALLY CONDUCTING AN ENTERPRISE)**

Between about September 2002 and March 2004, DEFENDANTS BRUCE DENNIS LOVE, , and

, being employed by or associated with an enterprise, conducted such enterprise's affairs through racketeering or participated directly or indirectly in the conduct of an enterprise that they knew was being conducted through racketeering, in violation of A.R.S. §§ 13-2312, 13-2301, 13-301 through 13-306, 13-701, 13-702, 13-702.01, and 13-801.

This conduct occurred as described in Counts 2-4 of this Indictment regarding operation of the BMR enterprise, for A.R.S. § 13-2301 defines "racketeering" to include

any of the following acts, if committed for financial gain: Participating in a criminal syndicate; a scheme and artifice to defraud; and, money laundering.

#### **COUNT 6 (CONSPIRACY)**

Between about April 2004 and February 2006, DEFENDANT BRUCE DENNIS LOVE, with the intent to promote or aid the commission of an offense, did knowingly agree with one or more persons that at least one of them or another person would engage in conduct constituting a criminal offense and one or more of those persons committed one or more overt acts in furtherance of that offense, in violation of A.R.S. §§ 13-1003, 13-301 through 13-306, 13-701, 13-702, 13-702.01, and 13-801.

This conduct occurred during Defendant's ownership and operation of BMN Business Associates, Inc. ("BMN"), which was an authorized delegate of Western Union at two locations, 3205 W. McDowell Rd. in Phoenix and 635 N. Country Club Rd. in Mesa. In the operation of this enterprise, Defendant agreed with employees and others that they would commit criminal offenses as necessary to serve the interests of, and to obtain business from, persons whom Defendant and his co-conspirators knew, had reason to know, suspected, or had reason to suspect, were engaged in criminal activity.

In furtherance of this conspiracy, Defendant and his co-conspirators knowingly committed overt acts that were designed to and did violate the SAR requirements of A.R.S. §§ 6-1241 and 6-133 and the anti-money laundering provisions of A.R.S. § 13-2317, and they engaged in this activity on a regular basis and in connection with a high percentage of the Western Union transactions at the BMN locations.

#### **COUNT 7 (PARTICIPATING IN A CRIMINAL SYNDICATE)**

Between about April 2004 and February 2006, DEFENDANT BRUCE DENNIS LOVE intentionally organized, managed, directed, supervised or financed a criminal syndicate with the intent to promote or further the criminal objectives of the syndicate, in violation of A.R.S. §§ 13-2308, 13-2301, 13-301 through 13-306, 13-701, 13-702, 13-702.01, and 13-801.



This conduct occurred regarding Defendant's operation of BMN as an authorized delegate of Western Union at two locations. In operating this enterprise, Defendant, in combination with employees and others, engaged on a continuous basis in conduct that violated any one or more provisions of any felony statute of Arizona, including the SAR requirements of A.R.S. §§ 6-1241 and 6-133 and the anti-money laundering provisions of A.R.S. § 13-2317.

#### **COUNT 8 (FRAUDULENT SCHEME AND ARTIFICE)**

Between about April 2004 and February 2006, DEFENDANT BRUCE DENNIS LOVE, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses, representations, promises or material omissions, and the benefit so obtained involved property with a value of \$100,000 or more, in violation of A.R.S. §§ 13-2310, 13-301 through 13-306, 13-701, 13-702, 13-702.01, and 13-801.

This conduct occurred when Defendant, by various knowing deceptions and omissions that included failing to file required SARs and filing false or misleading SARs, hid the extent of the money laundering at the BMN locations, facilitated that illegal activity, and received over \$100,000 in Western Union commissions on that activity.

#### **COUNT 9 (MONEY LAUNDERING)**

Between about April 2004 and February 2006, DEFENDANT BRUCE DENNIS LOVE knowingly initiated, organized, planned, financed, directed, managed, supervised or was in the business of money laundering, and he did so as part of a pattern of violations that involved a total of \$100,000 or more in any twelve month period, in violation of A.R.S. §§ 13-2317(A)(1) and (D), 13-2301, 13-301 through 13-306, 13-701, 13-702, 13-702.01, and 13-801.

This conduct occurred regarding Defendant's operation of the BMN enterprise, which he did with an established pattern of violating anti-money laundering laws,

including the provisions of A.R.S. § 13-2317(B), which provides, in part, that a person is guilty of money laundering who does any of the following acts:

1. Acquires or maintains an interest in, transacts, transfers, transports, receives or conceals the existence or nature of racketeering proceeds knowing or having reason to know that they are the proceeds of an offense.

...

3. Conducts a transaction knowing or having reason to know that the property involved is the proceeds of an offense and with the intent to conceal or disguise the nature, location, source, ownership or control of the property or the intent to facilitate racketeering.

4. Intentionally or knowingly makes a false statement, misrepresentation or false certification or makes a false entry or omits a material entry in any application, financial statement, account record, customer receipt, report or other document that is filed or required to be maintained or filed under title 6, chapter 12.

5. Intentionally or knowingly evades or attempts to evade any reporting requirement under section 6-1241, whether by . . . failing to file a required report or record or by any other means.

...

9. If the person is . . . engaged in a trade or business, intentionally or knowingly accepts false personal identifying information from any person or otherwise knowingly incorporates false personal identifying information into any report or record that is required by section 6-1241.

#### **COUNT 10 (ILLEGALLY CONDUCTING AN ENTERPRISE)**

Between about April 2004 and February 2006, DEFENDANT BRUCE DENNIS LOVE, being employed by or associated with an enterprise, conducted such enterprise's affairs through racketeering or participated directly or indirectly in the conduct of an enterprise that he knew was being conducted through racketeering, in violation of A.R.S. §§ 13-2312, 13-2301, 13-301 through 13-306, 13-701, 13-702, 13-702.01, and 13-801.

This conduct occurred as described in Counts 7-9 of this Indictment regarding operation of the BMN enterprise, for A.R.S. § 13-2301 defines "racketeering" to include any of the following acts, if committed for financial gain: Participating in a criminal syndicate; a scheme and artifice to defraud; and, money laundering.



### COUNTS 11-80 (MONEY LAUNDERING)

On or about the dates specified below, DEFENDANT BRUCE DENNIS LOVE acquired or maintained an interest in, transacted, transferred, transported, received or concealed the existence or nature of racketeering proceeds knowing or having reason to know that they were the proceeds of an offense and/or conducted a transaction knowing or having reason to know that the property involved was the proceeds of an offense and with the intent to conceal or disguise the nature, location, source, ownership or control of the property or the intent to facilitate racketeering and/or intentionally or knowingly made a false statement, misrepresentation or false certification or made a false entry or omitted a material entry in any application, financial statement, account record, customer receipt, report or other document that was filed or required to be maintained or filed under title 6, chapter 12 of the Arizona Revised Statutes and/or intentionally or knowingly evaded or attempted to evade any reporting requirement under section 6-1241 of the Arizona Revised Statutes, whether by causing any financial institution, money transmitter, trade or business to fail to file the report, by failing to file a required report or record, or by any other means, and/or, being a person engaged in a trade or business, intentionally or knowingly accepted false personal identifying information from any person or otherwise knowingly incorporated false personal identifying information into any report or record that was required by section 6-1241 of the Arizona Revised Statutes, in violation of A.R.S. §§ 13-2317(B)(1, 3, 4, 5 and 9), 13-2301, 13-301 through 13-306, 13-701, 13-702, 13-702.01, and 13-801.

COUNT	DATE	MTCN	PAYEE NAME	AMOUNT
11	01-23-2005	4665606069	Jaime Cruz Lopez	\$3,000
12	01-24-2005	0932705625	Jaime Cruz Lopez	\$1,500
13	01-24-2005	0487724045	Jaime Cruz Lopez	\$3,000
14	01-24-2005	1195662580	Jaime Cruz Lopez	\$2,400
15	02-08-2005	2223155231	Jaime Cruz Lopez	\$1,300
16	02-09-2005	4520189402	Jaime Cruz Lopez	\$1,300

COUNT	DATE	MTCN	PAYEE NAME	AMOUNT
17	02-09-2005	4098794491	Jaime Cruz Lopez	\$500
18	02-04-2005	9035357440	Raul Sarmiento Aparicio	\$1,500
19	02-10-2005	6956463234	Raul Sarmiento Aparicio	\$2,100
20	03-10-2005	5348839344	Raul Sarmiento Aparicio	\$1,450
21	03-13-2005	5486293962	Raul Sarmiento Aparicio	\$2,200
22	01-27-2005	7452762926	Javier Bastidas Gutierrez	\$1,200
23	03-08-2005	3306421627	Javier Bastidas Gutierrez	\$1,350
24	04-26-2005	1013127970	Javier Bastidas Gutierrez	\$800
25	04-26-2005	9963242892	Javier Bastidas Gutierrez	\$800
26	02-16-2005	3586082845	Daniel Angel Oulade	\$3,200
27	02-20-2005	1991369730	Daniel Angel Oulade	\$3,000
28	02-20-2005	6446001436	Daniel Angel Oulade	\$1,300
29	02-20-2005	7568261972	Daniel Angel Oulade	\$1,500
30	02-25-2005	5791196297	Daniel Angel Oulade	\$1,500
31	02-25-2005	3916570750	Daniel Angel Oulade	\$3,000
32	03-01-2005	6820157145	Daniel Angel Oulade	\$2,500
33	02-20-2005	9011073308	Miguel Angel Cruz Dominguez	\$1,500
34	02-22-2005	9932641641	Miguel Angel Cruz Dominguez	\$1,500
35	02-24-2005	3187569394	Miguel Angel Cruz Dominguez	\$1,500
36	02-25-2005	2903176681	Miguel Angel Cruz Dominguez	\$1,500
37	02-25-2005	1605932410	Miguel Angel Cruz Dominguez	\$4,500
38	02-25-2005	9145937279	Miguel Angel Cruz Dominguez	\$3,000
39	02-26-2005	0126300800	Miguel Angel Cruz Dominguez	\$1,500
40	01-02-2005	2880653108	Zoila Alaniz Barrera	\$1,500
41	01-02-2005	5130495211	Victor Manuel Cruz Vargas	\$1,500
42	01-19-2005	5095388011	Victor Manuel Cruz Vargas	\$1,567



COUNT	DATE	MTCN	PAYEE NAME	AMOUNT
43	01-31-2005	2588637622	Rene Reyes Sandoval	\$1,500
44	01-31-2005	4493272702	Gudelia Flores Lucio	\$1,500
45	02-01-2005	3127900173	Luis Munoz Huazo	\$1,700
46	02-01-2005	7241123971	Gabriela Maya Zenon	\$1,600
47	02-01-2005	3766534954	Gabriela Maya Zenon	\$1,640
48	02-01-2005	2135337274	Rene Reyes Sandoval	\$1,500
49	02-01-2005	3186299462	Zaidel Hernandez Ramirez	\$2,400
50	02-02-2005	7372859331	Gerardo Alvarado Granados	\$1,700
51	02-02-2005	0232880451	Jose Juan Ramirez Avendano	\$2,400
52	02-07-2005	2890757754	Rito C Ruiz Avalos	\$1,800
53	02-08-2005	5400858890	Carlos Quevedo Davila	\$1,500
54	02-24-2005	1688732379	Abel Garcia Chavez	\$1,800
55	05-07-2005	1190510896	Jorge Luis Perez Paredes	\$800
56	10-15-2005	4495510259	Ana Auerelia Quintero Chavez	\$1,400
57	08-22-2005	6363545410	Federico Hernandez Diaz	\$1,900
58	08-22-2005	2512724572	Damian Jimenez Aquino	\$1,700
59	08-22-2005	1655501192	Guillermo Juarez Jimenez	\$1,000
60	08-28-2005	8121312814	Federico Hernandez Diaz	\$900
61	08-28-2005	3925636400	Federico Hernandez Diaz	\$1,900
62	08-28-2005	0611430541	Guillermo Juarez Jimenez	\$1,700
63	01-21-2006	6443650745	Fabian Morales Juarez	\$2,000
64	01-22-2006	9161435931	Fabian Morales Juarez	\$2,000
65	02-02-2006	5251773494	Armando Garcia Basilio	\$1,000
66	02-03-2006	1466786001	Armando Garcia Basilio	\$2,000
67	02-04-2006	4381786557	Armando Garcia Basilio	\$2,000


COUNT	DATE	MTCN	PAYEE NAME	AMOUNT
68	02-13-2005	1750890441	Misael Aguilar	\$4,200
69	03-16-2005	6610986839	Antonio Oscar Mercado	\$3,000
70	05-02-2005	6600946056	Sandra Mena Escobar	\$3,150
71	05-07-2005	1170560350	Benigno Tigre Tigre	\$2,500
72	06-13-2005	9182951401	Denia Parra	\$1,200
73	06-19-2005	6106449071	Denia Parra	\$1,100
74	07-16-2005	7225478670	Jose Demetrio Lopez Amaya	\$3,800
75	07-19-2005	7512769021	Jose Alfredo Tuquer Chavez	\$2,000
76	07-21-2005	5775165308	Oscar Cepeda Cortez	\$3,700
77	06-11-2005	1490583761	Jose Demetrio Lopez Amaya	\$700
78	08-03-2005	2111036943	Jose Demetrio Lopez Amaya	\$2,100
79	08-20-2005	8355155875	Jose Demetrio Lopez Amaya	\$1,000
80	08-30-2005	2525618939	Jose Demetrio Lopez Amaya	\$1,000

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in or from Maricopa County, Arizona.

True Bill  
(A "True Bill")

TERRY GODDARD  
ATTORNEY GENERAL  
STATE OF ARIZONA

January 16, 2008  
Dated:

  
E. G. Noyes, Jr.  
Monica Klapper  
Assistant Attorneys General

  
Foreperson of the State Grand Jury